

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Supplemental Petition of the	)	
Connecticut Department of Public Utility Control	)	CC Docket No. 99-200
for Authority to Conduct a Transitional	)	
Service Technology Specific Overlay Trial	)	
in Connecticut	)	

**COMMENTS OF SBC COMMUNICATIONS, INC.**

SBC Communications Inc. (SBC), on its own behalf and on behalf of its local exchange carriers, submits its comments on the “Petition of the Connecticut Department of Public Utility Control (Connecticut Commission) for Authority to Implement a Transitional Service Technology Specific Service Overlay Trial — Supplemental Information” (Supplemental Petition).<sup>1</sup>

**DISCUSSION**

**A. The implementation of SOs is not preferable to an all-services overlay.**

SBC agrees with other commenters that the Connecticut Commission has not demonstrated that the proposed specialized overlay (SO) is a superior method of area code relief for numbering optimization benefits. Although SBC supports limited transitional overlays, SBC believes the greatest benefits can currently be reaped in areas where thousands-block number pooling has not yet been implemented or where non-LNP carriers are not able to participate in number pooling. Since number pooling has already been implemented in both of the Connecticut NPAs and wireless carriers are required to become LNP-capable by November 2002 — and thus will be required to participate in number pooling — benefits from SO area code relief will likely be minimal. Numbering resource optimization will be better realized with a standard all-services overlay where carriers can share resources from a common pool instead of creating a separate area code, or pool, for different services.

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<sup>1</sup> See *Numbering Resource Optimization*, CC Docket No. 99-200, *Public Notice*, DA 02-1292 (rel. May 31, 2002).

Interestingly, in its Supplemental Petition the Connecticut Commission suggested that carriers participating in the SO would “have the opportunity to pool numbering resources in the underlying NPAs just as they would if the Connecticut SO was not implemented.”<sup>2</sup> Because this proposal would allow certain service providers the ability to inefficiently utilize two separate NPAs, it would further minimize any benefits gained from implementing a specialized overlay.

**B. The parties need more information on non-geographic sensitive services.**

SBC continues to request additional clarification on the type of non-geographic services to be included in a specialized overlay. Although the Connecticut Commission has specified unified messaging and high-speed transport as *potential* services to include in a SO,<sup>3</sup> it is unclear what number of lines would be included. Most likely, SBC will not be able to identify the users of these specific services (e.g., unified messaging or “OnStar-type” services) without customer self-identification, because these types of services do not carry a unique class of service designation in SBC’s records. Regardless, SBC expects that the number of numbers identified would be small; therefore, SBC wonders whether the assigned area code for the SO would be efficiently utilized or cost-efficient to implement. Additionally, if the non-geographic sensitive numbers can be identified, customers will be inconvenienced, because, under this SO scheme, numbers would need to be returned and new numbers assigned in the SO area code.

**C. If ten-digit dialing is implemented, SBC does not oppose making area code exhaust the trigger for the transition to an all-services overlay.**

The Connecticut Commission, in its petition, stated that the exhaust of the underlying area code would become the “trigger” for transitioning to an all-services overlay.<sup>4</sup> Should the Commission decide to delegate authority to the Connecticut Commission to implement a SO, SBC is not opposed to using exhaust as a trigger for the all-services overlay as long as mandatory ten-digit dialing has already been implemented.

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<sup>2</sup> Petition, at p. 5

<sup>3</sup> *Id.* at p. 3

<sup>4</sup> *Id.* at p. 5

According to the latest NANPA projections, NPAs 203 and 860 will exhaust in the third quarter of 2004 and first quarter of 2004, respectively.<sup>5</sup> Since the Connecticut Commission recommends a twelve-month period for a ten-digit dialing customer education program, this education program would need to begin by the first quarter of 2003.

**D. Ten-digit dialing is recommended.**

SBC continues to support and recommend a uniform ten-digit dialing plan across the NANP to minimize customer confusion particularly when dialing between area codes or service provider territories and also when traveling between states. Uniform ten-digit dialing minimizes the controversy of implementing overlay area code relief and promotes numbering optimization.

Respectfully submitted,

SBC COMMUNICATIONS INC.

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<sup>5</sup> NANPA 2002 NRUF and NPA Exhaust Analysis, June 5, 2002.